

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DONALD J. TRUMP FOR PRESIDENT,
INC., *et al.*,

Plaintiffs,

v.

KATHY BOOCKVAR, in her capacity as
Secretary of the Commonwealth of
Pennsylvania, *et al.*,

Defendants.

Civil Action No. 2:20-cv-00966-NR

Judge J. Nicholas Ranjan

MOTION FOR LEAVE TO FILE UNDER SEAL

Defendant-Intervenors Citizens for Pennsylvania's Future and the Sierra Club respectfully request leave to file their Brief In Opposition To Plaintiffs' Motion To Modify Stay Order And For Preliminary Injunctive Relief (ECF 414) and Appendix under seal. Plaintiffs seek to file these documents under seal out of an abundance of caution because they contain nonconfidential content of a deposition during which certain other statements were designated as confidential and the 30-day period for the deponent's review has not expired under the operative protective order. *See* ECF 349-1 paragraph (e). Defendant-Intervenors will meet and confer with counsel for Plaintiffs concerning the nonconfidential nature of the discovery material at issue and bring any dispute to the Court's attention. This request is made pursuant to LCvR 5.2.H.

Dated: September 2, 2020

Respectfully submitted,

/s/ Eliza Sweren-Becker

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CERTIFICATE OF SERVICE

I, Eliza Sweren-Becker, certify that I served the foregoing MOTION FOR LEAVE TO FILE UNDER SEAL sent automatically by CM/ECF to the following counsel who are registered as CM/ECF filing users who have consented to accepting electronic service through CM/ECF:

All counsel of record

Dated: September 2, 2020

Respectfully submitted,

/s/ Eliza Sweren-Becker

*Counsel for Defendant-Intervenors
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